

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Yelena Goldin

GENERAL INFORMATION:

Name:	IPSCO Tubulars (Kentucky) Inc.
Address:	100 Steel Plant Road Wilder, KY 41071
Date application received:	5/30/2008
SIC Code/SIC description:	3317, Steel Pipe and Tubes
Source ID:	21-037-00006
Agency Interest:	613
Activity:	APE20080001
Permit:	V-08-023

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☐ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☐ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☒ Area is non-attainment (list pollutants): Ozone

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM/PM ₁₀	26.49	26.49
VOC	219.73	219.73

SOURCE DESCRIPTION:

On May 30, 2008, the source applied to the Division for the renewal of the operating permit of the facility in Wilder, Kentucky for the manufacturing of steel pipes and tubes.

The manufacturing process begins by feeding these steel coils into the material handling equipment of either the 8" or 16" Pipe Mill where they are cold-formed into a tubular configuration.

The resultant tube is in-line welded by a high frequency electric resistance welder and cut into designated lengths. The pipe is inspected, tested, and coated with a varnish if required. Welded tubular products range in size from 4.5 to 16.0 inches in outside diameter.

Based on their criteria air pollutants emissions, the plant requires a Title V permit. This facility is currently located in an ozone non-attainment area.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

Emission Point #8: Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 8" diameter, with a maximum usage of 50,000 gallons of clear coat per year. Potential criteria air pollutants emissions (PTE) were calculated based on the maximum usage rate of 50,000 gallons, which source has provided.

No specific control equipment is required to be used at this point. In order to be exempt from Section 3 of 401 KAR 61:132, permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

Emission Point #9: Continuous steel pipe coating using a clear coat lacquer to coat pipes between 4" and 16" diameter, with a potential to emit of 76.1 tons per year.

In order to be exempt from Section 3 of 401 KAR 59:225, the permittee shall only apply clear coats with a VOC content that is less than 0.52 kg/l of coating (four and three-tenths (4.3) lb/gal), excluding water or exempt solvent or both, delivered to applicators associated with clear coat.

The permit has required the emissions from this point to stay below 76.1 tons per year to preclude the construction of this unit from being consider a major modification to a major source in a nonattainment area. Capture percentage will not be consider in the calculation unless it is measurable.

Emissions Point #11: Haul roads, paved and unpaved. Only fugitive particulate emissions are generated at this point. The only requirement for this point is that the dust emissions be kept to a minimum through the watering of unpaved roads and keeping paved roads clean. Emission factors used were based on numbers presented by the company and the SCC units used are tons of steel produced, since the road usage will depend on the production rate of the plant.

Emission Point #14: Parts Washers (12).

To prevent the applicability of the control requirements per 401 KAR 59:185, New solvent metal cleaning equipment. Applicable to affected facilities commenced on or after June 29, 1979 located in a county designated in 401 KAR 51:010 as nonattainment for ozone for any classification except marginal, the following conditions shall be satisfied for these units:

- * The cold cleaner shall have a remote solvent reservoir.
- * Cold cleaners shall not use a solvent with a vapor pressure that exceeds one (1.0) mm Hg (0.019 psi) measured at 20° C (68°F).
- * The cold cleaner solvent shall not be heated above 120°F.
- * The sink-like work area shall have an open drain area less than 100 sq. cm.
- * Evidence shall be provided that waste solvent shall be stored properly and disposed of with minimal loss due to evaporation.

Emission point #15: Cooling towers (2)

No chromium-based water treatment chemicals shall be used in the industrial process cooling towers.

OPERATIONAL FLEXIBILITY:

NA
